

REMARKS

Claims 2-6, 10, 11, 13, 18-20, 22-24, 26, 28, 29 and 31-36 were previously pending in this application. No claims have been amended, canceled or added. As a result, claims 2-6, 10, 11, 13, 18-20, 22-24, 26, 28, 29 and 31-36 are still pending for examination with claims 3, 4 and 34-36 being independent claims. No new matter has been added. Applicant respectfully requests reconsideration in view of the following arguments.

Allowable Subject Matter

It is noted with appreciation that the Examiner has allowed claims 4, 5, 18-20, 26, 28, 29, 31, 32 and 34-36.

Rejections Under 35 U.S.C. §103

In the Office Action dated February 28, 2007, claims 2-3, 6, 10, 13, 22-24 and 33 were rejected under 35 U.S.C. §103(a) as being unpatentable over Popovich (U.S. Patent No. 4,337,759), and claim 11 was rejected as being unpatentable over Popovich in view of Aho (U.S. Patent No 5,097,395).

Applicant respectfully traverses the rejection of independent claim 3. Independent claim 3 is directed to an insert for placement in a door light. The insert includes a substantially planar top surface defining a plane, and a raised portion at least partially surrounded by the top surface. The raised portion includes at least two features which are raised with respect to the plane of the top surface. The raised portion has a substantially uniform configuration, and the raised portion defines an upper surface. The at least two features on the raised portion include at least two raised concentric rings substantially centered on the insert. The insert also includes a substantially planar bottom surface spaced apart from and disposed substantially in parallel in relation to the top surface, and a recessed portion at least partially surrounded by the bottom surface. The recessed portion includes at least two features which are recessed with respect to the bottom surface, and the recessed portion defines a lower surface. The at least two features on the recessed portion include at least two recessed concentric rings which *substantially correspond in shape and size to the at least two*

raised concentric rings on the raised portion, and the distance between the upper surface of the raised portion and the lower surface of the recessed portion is substantially uniform throughout.

Popovich is directed to a dome-shaped radiant energy concentrator for heating a fluid reservoir, such as a water pipe. Radiant energy passes through an entry face 12 on the concentrator which is made up of stair-stepped faces 12a and 12b and travels out through the exit face 13 towards the target 15. As discussed in Popovich, the entry face 12 and exit face 13 are configured to concentrate radiant energy in the form of rays 16a, 16b towards the target 15 inside the device.

The Office Action states that Popovich discloses at least two features on a recessed portion that includes at least two recessed concentric rings which substantially correspond in shape and size to the at least two raised concentric rings on the raised portion, where the distance between the upper surface of the raised portion and the lower surface of the recessed portion is substantially uniform throughout and points to FIG. 10A in Popovich. Applicants respectfully disagree.

FIG. 10A in Popovich does not disclose a configuration where the recessed portion substantially corresponds in shape and size to the raised portion such that the distance between the upper and lower surface is substantially uniform. As shown in FIG. 10A, the upper surface has a stepped configuration where each step forms a 90 degree angle. In contrast, the lower surface shown in FIG. 10A has an angled surface with facets 444 where each facet forms approximately a 45 degree angle. Thus, in the embodiment shown in FIG. 10A, the lower surface does not substantially correspond in *shape and size* to the upper surface and the *distance* between these two surfaces varies along the body means 440, and is thus not substantially uniform throughout, as recited in claim 3.

The Office Action provides helpful feedback regarding the arguments made in the prior Amendment. In particular, the Office Action bolds and underlines the claim term “substantially” and points to the claim term “substantially uniform” and asks how one defines substantially uniform. Applicant would like to draw the Examiner’s attention to FIGS. 3A-3B of the present application. These figures illustrate one embodiment where at least two recessed concentric rings on the recessed portion substantially correspond in size and shape to the at least two raised concentric rings on the raised portion, and the distance between the upper surface of the raised portion and the lower surface of the recessed portion is substantially uniform throughout. In other

words, the insert looks similar on each side. In contrast, the energy concentrator shown in FIG. 10A of Popovich does not look similar on each side, and thus does teach or suggest all of the limitations recited in independent claim 3.

Furthermore, as pointed out in the Amendment dated November 29, 2006, the disclosure in Popovich actually teaches away from the invention recited in independent claim 3. Claim 3 recites an insert for placement in a door that is configured such that the insert looks substantially similar on each side. By contrast, Popovich is directed to a solar heat concentrator, where the angle and configuration of the upper and lower surface affect how rays are diverted and thus concentrated. There is no teaching or suggestion to modify the concentrator in Popovich such that the distance between the upper and lower surfaces is substantially uniform throughout as recited in claim 3. In fact, if Popovich were so modified, facets 444 would not achieve their desired function to “bend rays 443 through 90 degrees onto cylindrical target 441”. (Popovich, Col. 8, lines 17-19). Rather, the rays of light would be directed downwardly, parallel to the target 441 and not toward it, defeating the purpose of the lens. Thus, Popovich actually teaches away from such a modification.

For at least these reasons, claim 3 is patentable over Popovich. Claims 2, 6, 10, 11, 13, 22-24 and 33 depend from claim 3 and are patentable for at least the same reasons.

Accordingly, the rejection of these claims should be withdrawn.

CONCLUSION

A Notice of Allowance is respectfully requested. The Examiner is requested to call the undersigned at the telephone number listed below if this communication does not place the case in condition for allowance.

If this response is not considered timely filed and if a request for an extension of time is otherwise absent, Applicant hereby requests any necessary extension of time. If there is a fee occasioned by this response, including an extension fee, that is not covered by an enclosed check, please charge any deficiency to Deposit Account No. 23/2825.

Respectfully submitted,

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